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U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

CARPENTERS' DISTRICT COUNCIL OF )  
GREATER ST. LOUIS AND VICINITY, et al., )

Plaintiffs/Judgment Creditors, )

v. )

KRAFT & ASSOCIATES CO., )

Defendant/Judgment Debtor. )

Case No. 4:11CV75-CAS

Return Date: August 1, 2011

**INTERROGATORIES DIRECTED TO GARNISHEE**

TO: MONTGOMERY BANK  
Serve: Agent Authorized to Accept Service  
1229 South Laclede Station Road  
Webster Groves, Missouri 63119

Note: This garnishment is directed to any and all property belonging to and assets of Defendant and Judgment Debtor Kraft & Associates, Co., whose last known address is 9738 Gravois Road, St. Louis, Missouri 63123, including but not limited to any and all depository accounts held in the name of or for the benefit of Defendant and Judgment Debtor Kraft & Associates, Co., any income or debts due to said Defendant and Judgment Debtor Kraft & Associates Co., individually or jointly with any other person or entity, which is in your custody and control, and which is subject to garnishment.

INSTRUCTIONS: You are to answer the interrogatories UNDER OATH within ten (10) days after the return date of the writ and mail the **ORIGINAL** TO:

United States District Court  
Attn: Clerk  
111 South Tenth Street, Suite 3.300  
St. Louis, Missouri 63102

and a COPY to the attorney for the Judgment Creditor listed below:

**Greg A. Campbell  
HAMMOND AND SHINNERS, P.C.  
7730 Carondelet, Suite 200  
St. Louis, Missouri 63105**

Come now plaintiffs pursuant to Rule 69 of the Federal Rules of Civil Procedure and Rule 90.13 of the Missouri Supreme Court Rules, and exhibit the following interrogatories to be answered by the Garnishee, under oath, within ten (10) days of the returnable date.

1. State whether Defendant and Judgment Debtor Kraft & Associates Co. has a savings account or a checking account with your banking institution and provide the account number and balance for the respective accounts.

**ANSWER:** NO ACCOUNTS CLOSED

2. At said time, were you, or have you since become, or are you now, in any way indebted to the Defendant and Judgment Debtor Kraft & Associates Co.?

**ANSWER:** NO

A. If your answer to Interrogatory No. 2 is in the affirmative, state in what amount and describe in detail any instrument or writing evidencing you are so indebted.

**ANSWER:**

3. At said time, were you, or have you since become, or are you now, bound in any contract to pay Defendant and Judgment Debtor Kraft & Associates Co. money which is not yet due?

**ANSWER:** NO

A. If your answer to Interrogatory No. 3 above is in the affirmative, state the nature of such contract, the amount of money to be paid thereunder and when the same was or is to become due and payable.

**ANSWER:**

4. At the time you were summoned as garnishee had you, or have you since that time had, or have you now, in your possession, custody or charge, or under your control, any goods, chattels, property, monies, credits or effects belonging to the Defendant and Judgment Debtor Kraft & Associates Co.?

**ANSWER:** NO

A. If your answer to Interrogatory No. 4 above is in the affirmative, state what they were or are, how much and their value, and how they came into your possession, custody, control or charge.

**ANSWER:**

Respectfully submitted,

HAMMOND AND SHINNERS, P.C.  
7730 Carondelet, Suite 200  
St. Louis, Missouri 63105  
Phone: (314) 727-1015  
Fax: (314) 727-6804

/s/ Greg A. Campbell  
GREG A. CAMPBELL, #2774

~~Attorneys for Plaintiffs/Judgment Creditors~~

**ATTESTATION TO BE COMPLETED BY GARNISHEE**

STATE OF MISSOURI       )  
                                  ) SS.  
COUNTY OF Scott       )

Sheryl Frazier, being duly sworn on his/her oath, the undersigned certifies he/she answered the foregoing interrogatories to the best of his/her knowledge, information, and belief.

Sheryl Frazier  
Print Name

Sheryl Frazier  
Signature

Operations/Accounting  
Position

August 1, 2011  
Date

Subscribed and sworn to before me this 1 st day of August, 2011.

My Commission Expires:



Brenda Winters  
NOTARY PUBLIC

**Certificate of Service**

The undersigned certifies that the original of the foregoing Answers to Interrogatories Directed to Garnishee were sent via first-class U.S. mail to the Clerk of the Court, U.S. District Court, 111 South Tenth Street, Suite 3.300, St. Louis, MO 63102, and a copy was also mailed to Greg A. Campbell, Attorney for Plaintiffs/Judgment Creditors, 7730 Carondelet Avenue, Suite 200, St. Louis, MO 63105, this 1st day of August, 2011.

Sheryl Frazier  
Signature of Garnishee



AUG 4 2011

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

August 1, 2011

Attn: Clerk  
United States District Court  
111 South Tenth Street Suite 3.300  
Saint Louis, MO 63102

Re: Carpenters' District Council of Greater St. Louis & Vicinity, et al., vs. Kraft & Associates Co.

In reference to garnishment case number 4:11cv75-cas, please find the enclosed copy of the interrogatory on Carpenters' District Council of Greater St. Louis & Vicinity, et al. vs. Kraft & Associates Co. We have no funds.

Sincerely,

Sheryl Frazier  
Montgomery Bank  
One Montgomery Bank Plaza  
P.O. Box 948  
Sikeston, MO 63801  
573-471-2275

Enclosure



Telephone: 1-800-455-2275 • E-mail: [customerservice@montgomerybank.com](mailto:customerservice@montgomerybank.com)





**Montgomery**  
BANK

P.O. BOX 948 ★ SKESTON, MO 63801-0948

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AUG -4 2011

UNITED STATES DISTRICT COURT

ATTN: CLERK

111 SOUTH TENTH STREET

SAINT LOUIS MO 63102

U.S. DISTRICT COURT

EASTERN DISTRICT OF MO

ST. LOUIS

PRESORTED  
FIRST CLASS

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